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November 3, 2008

EPA Region 10
Solid Waste and Toxics Unit
1200 Sixth Ave, Suite 900
Seattle WA 98101
Attn: Dan Duncan

Recycling
& Recovery

RE: Unmanifested Waste Report – Emerald Recycling

Marine &
Industrial Cleaning

Dear Mr. Duncan;

Recycled Products

As you are aware, Emerald Recycling (Emerald) received a load of PCB contaminated oil from El Tec, 2401 Utah St., Seattle WA 98134. As of today, Emerald has been unsuccessful in reaching anyone who is willing and able to sign a hazardous waste manifest for the shipment from El Tec. The attached information is therefore being provided per the requirements for an unmanifested waste report under 40 CFR Part 761.211.

Waste Treatment
& Disposal

1) EPA Identification Number, Name and Address of the PCB Commercial Storage or Disposal Facility:

Automotive Fluids
Management

Temporary Storage: Emerald Recycling
1500 Airport Way S.
Seattle WA 98134
WAD 058 367 152

Construction
Services

TSDF: Clean Harbors (Aragonite), LLC
11600 N. Aptus Rd, Exit 56
Aragonite UT 84029
UTD 981 552 177

Transportation
Services

2) Date the commercial storage or disposal facility received the unmanifested PCB waste:

Unmanifested PCB waste was received on October 9, 2008 at Emerald Recycling. PCB waste was confirmed as regulated under TSCA on October 20, 2008.

Vacuum Truck
Services

3) The EPA Identification Number, Name, and Address of the Generator and Transporter:

Portable Storage

Generator: El Tec
2401 Utah St.
Seattle WA 98134
EPA ID# Pending

USEPA REG



0001028

Your Partner for Recycling and Environmental Services

Corporate Office: 7343 E. Marginal Way So. • Seattle, WA 98108 • (206) 832-3000 • 1-888-832-3008 • Fax (206) 832-3030

Transporter: Emerald Services, Inc.
7343 East Marginal Way S.
Seattle WA 98108
WAD 058 364 647

4) A description of the Type and Quantity of the Unmanifested PCB Waste Received at the Facility:

250 gallons of PCB contaminated used oil contributing to contamination of approximately 5,700 gallons of used oil at the Emerald Recycling facility.

5) A Brief Explanation of Why the Waste was Unmanifested:

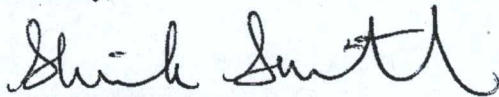
The generator was unaware that the used oil was contaminated with PCBs.

6) The Disposition Made of the Unmanifested Waste by the Commercial Storage or Disposal Facility:

The unmanifested waste was temporarily stored in tanks at the Emerald Recycling facility located on Airport Way in Seattle until disposal arrangements could be made for the waste. Of the original contaminated volume of approximately 5,700 gallons, 20,462 kg of contaminated oil and decontamination fluids were shipped from the Emerald facility on October 27, 2008. One drum of contaminated PPE and debris was also generated from the decontamination process. This drum was shipped from the Emerald facility on November 3, 2008. All shipments coordinated by Emerald were accompanied by a Uniform Hazardous Waste Manifest.

Emerald will provide a complete report to EPA regarding receipt, on-site management, and off-site shipment of this PCB contaminated used oil once all documents pertaining to the issue have been received. This report from Emerald will include details of on-site decontamination of tanks, and copies of certificates of disposal from the TSDF (Clean Harbors). If you have any questions in the meantime, please feel free to contact me at the numbers below.

Sincerely,



Sheila Smith, Environmental Coordinator
Emerald Services, Inc.
(206) 832-3204 (Office)
(253) 370-7912 (Cell)
(206) 832-3304 (fax)
sheilas@emeraldnw.com

cc: Facility Operating Record